

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

In re:)
) Case No.: 16-40538-705
PATRICIA LEONARD,)
) Chapter 7
Debtor,)
) **MOTION TO DELAY ENTRY OF
DISCHARGE**
PATRICIA LEONARD,)
)
Movant,)
)
vs.)
)
E. REBECCA CASE,)
)
Trustee,)
)
Respondent.)

MOTION TO DELAY ENTRY OF DISCHARGE

COMES NOW Debtor, by and through Debtor's undersigned Counsel, and moves this Court to delay the order of an entry of discharge in Debtor's case by thirty (30) days and until June 17, 2016. In support thereof Debtor states as follows:

- 1) Debtor filed the above-captioned case in good faith on January 27, 2016.
- 2) Debtor completed her First Meeting of Creditors on March 18, 2016.
- 3) On March 22, 2016 the Chapter 7 Trustee Rebecca Case filed a report of no distribution.
- 4) On April 15, 2016 Debtor's personal financial management certificate was filed.
- 5) Waycliffe Development Corporation ("Waycliffe") holds a judgment lien against real property at 614 Grant Court, St. Louis, Missouri 63119 owned by Debtor and Debtor's husband,

David Leonard.

6) Debtor's husband David Leonard filed a Chapter 7 case on August 10, 2015, the case number of which is 15-45968.

7) On September 7, 2015 David Leonard filed a motion to avoid the judicial lien of Waycliffe, which objected to the motion to avoid the judicial lien based on its averments as to the value of the real property. A hearing on this motion was held on February 29, 2016 and the matter taken under submission. To date no ruling has been made on David Leonard's motion to avoid the judicial lien.

8) Debtor in the above-captioned case is unsure whether filing a motion to avoid the judicial lien in this case is warranted due to the motion David Leonard's case not yet being ruled on.

9) Debtor seeks a delay of the entry of discharge in her case to prevent case closure in order to afford the opportunity to file a motion to avoid the judicial lien of Waycliffe if the Court grants the motion to avoid the judicial lien in her husband's case.

WHEREFORE, Debtor prays that this honorable Court enter an order to delay the order of an entry of discharge in Debtor's case by thirty (30) days and until June 17, 2016 and for such other and further relief as is necessary and proper in the premises.

Respectfully submitted,

/s/ Frank R. Ledbetter
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CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the above was sent either electronically or by U. S. Mail, First Class, postage pre-paid to the following parties and the creditors on the attached mailing matrix on this 18th day of May 2016:

Office of the U. S. Trustee
111 S. 10th Street, Suite 6353
St. Louis, MO 63102

John V. LaBarge, Jr.
Chapter 13 Trustee
PO Box 430908
St. Louis, MO 63143

/s/ Frank R. Ledbetter